

Sheldrake, Sean

From: Sheldrake, Sean
Sent: Friday, April 24, 2015 12:29 PM
To: bayuk.dana@deq.state.or.us
Cc: Lance Peterson (PetersonLE@cdmsmith.com)
Subject: FW: NW Natural and Siltronic, Draft DEQ Comments Phase 1 HC&C Testing Summary Report and Fill WBZ Evaluation
Attachments: (EPA edit)DRAFT_DEQ_Comments-NWN_Ph1_Testing_Report.docx; (EPA edit)DEQ_Comments-Siltronic_Fill_WBZ_Evaluation_with SEC annotated notes.docx; EPA Comments on 1-30-15 Phase 1 Data Summary Report_23_APR_15.docx

Dana,

EPA completed a review of the draft letters and some suggested edits are attached. Note that some stand-alone comments were also generated on the Phase 1 Testing Data Summary Report and are attached for your consideration.

Let me know if you have any questions & have a great weekend.

Thank you.

S

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From: BAYUK Dana [<mailto:BAYUK.Dana@deq.state.or.us>]
Sent: Wednesday, April 22, 2015 9:35 AM
To: Sean Sheldrake (sheldrake.sean@epa.gov)
Cc: Peterson, Lance; Coffey, Scott; Gamache, Matthew; LARSEN Henning
Subject: NW Natural and Siltronic, Draft DEQ Comments Phase 1 HC&C Testing Summary Report and Fill WBZ Evaluation

Good morning Sean.

Attached are DEQ's draft comments letters regarding the following documents submitted by NW Natural and Siltronic:

- "Groundwater Source Control Phase 1 Testing Data Summary Report, NW Natural Gasco Site" dated January 30, 2015 (Phase 1 Summary Report); and
- "Fill Water-Bearing Zone Data Evaluation" technical memorandum dated March 25, 2015 (Fill WBZ Evaluation).

Anchor QEA, LLC prepared the Phase 1 Summary Report for NW Natural. Maul Foster and Alongi, Inc. prepared the Fill WBZ Evaluation on behalf of Siltronic.

The two documents together are intended to evaluate water level data for the HC&C system Phase 1 tests (i.e., Steps 1-6).

The primary purpose of both letters is to inform the two companies that DEQ:

- Considers the Phase 1 Summary Report and the Fill WBZ Evaluation to be incomplete as they focus only on evaluating the data from one Phase 1 test (i.e., Step 6); and
- Requests that NW Natural and Siltronic prepare supplements to the documents.

NOTE that as we've done in come previous comments letters, I've indicated that EPA has reviewed the documents and concurs with DEQ's letter. Let me know if this is the case or whether your team will be submitted comments separately.

Given the proposed Phase 2 testing schedule, I'd like to get these letters out next week so Anchor and MFA can prepare the supplements and give us adequate time for our reviews before the end of 60-day Phase 2 test ending July 14, 2015.

Let me know if you have questions or need more information and thanks for your team's time and work reviewing the letters.

Dana

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This spring, DEQ's Northwest Region Office will be moving to a new location - the 700 Lloyd Building at 700 NE Multnomah St., Suite #600, Portland, OR 97232. The date for operating at the new location is May 18th, 2015

